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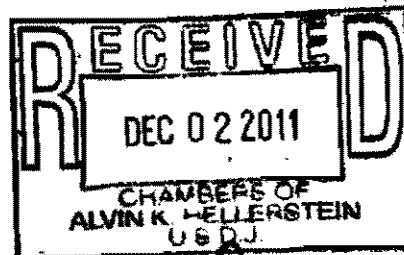
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December 1, 2011

Via: ELECTRONIC MAIL AND HAND DELIVERY

Hon. Alvin K. Hellerstein, U.S.D.J.  
United States District Court for the  
Southern District of New York  
500 Pearl Street, Rm. 1050  
New York, NY 10007

*Re: In re World Trade Center Disaster Site Litigation, 21 MC 100 (AHK)*

Dear Judge Hellerstein,

The undersigned counsel for approximately seventy-eight defendant subcontractors (the "Sub-Contractors") and defendant The City of New York (the "City") submit this joint letter to request a two-week extension of the schedule for the City's motion to quash the Sub-Contractors' subpoenas of documents concerning medical studies conducted by the New York City Fire Department.

As suggested by the Court at the conference held on November 22, counsel are engaged in discussions designed to fashion an appropriate protective order of confidentiality and narrow the issues that will need to be addressed by the Court. These discussions require detailed analysis of many issues and consultation by each side with its expert witnesses.

At the November 22 conference, the Court invited the parties to request a two-week extension of the motion schedule if it was needed to engage in the kind of discussions that are currently underway. The undersigned now request that the Court grant such an adjournment.

The current schedule calls for the City's motion by December 7, the Sub-Contractors' opposition by December 21, and the City's reply by January 4. The parties ask that the revised schedule require the City's motion by December 21, the Sub-Contractors' opposition by January 11, and the City's reply by January 18. The overall schedule would be extended by two weeks but internal deadlines are adjusted because of the holidays.

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Thank you for your consideration of this matter.

Respectfully submitted,



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